PLEASE TAKE NOTICE, that upon the annexed Declaration of SUSAN V. TIPOGRAPH, the attached Exhibits and all prior papers and proceedings heretofore had, the undersigned, on behalf of defendant RUBEN ESTRADA, will move this Court before the Honorable Paul G. Gardephe, at the United States Courthouse located at 40 Foley Square, New York, New York, at a date and time to be determined by the Court, for an Order directing the government to furnish a Bill of Particulars, and any other relief as may be just and proper.

The grounds for this motion are more fully set forth in the accompanying Memorandum of Law.

Dated: January 10, 2014 New York, New York

Yours, etc.

SUSAN V. TIPOGRAPH
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